

# NRC INSPECTION MANUAL

PRPB

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## INSPECTION PROCEDURE 99100

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### HEALTH PHYSICS POSITIONS

#### PROGRAM APPLICABILITY:

##### 99100-01 PURPOSE

To describe the Health Physics Positions (HPPOS) database NUREG/CR-5569 and provide instructions for using the HPPOS computer program.

##### 99100-02 OBJECTIVE

To summarize staff technical positions on radiation protection (health physics) matters related to the inspection program and to allow users to search for information through a variety of parameters.

##### 99100-03 DESCRIPTION OF DATABASE

The HPPOS database contains summaries of pertinent letters, memoranda, and excerpts from technical reports pertaining to inspection, enforcement, and licensing issues. The PRPB staff and others have evaluated these documents, as appropriate, to ensure uniformity in inspection, enforcement, and licensing actions. The HPPOS database program does not establish any new staff guidance. Rather, the program contains summaries of the staff's positions from documents already issued.

For each document, the database contains the following elements:

- a. record number
- b. PDR accession number
- c. title and summary of contents
- d. regulatory references (up to three)
- e. subject codes (up to three)
- f. applicability (to type of licensee)

Each document included in the system has been assigned up to three subject codes and three regulatory reference codes to aid in searching the database. The database includes 99 subject codes in 11 major categories. The first paragraph

of each summary specifies the type of document, its author, its addressee, and the date the document was released.

The HPPOS database is available in two forms: NUREG/CR-5569 and a computer program. The NUREG report and the computer program contain identical information.

The Health Physics Positions database will be updated periodically to reflect new NRC guidance or to revise existing guidance as regulations change.

#### 99100-04 RESPONSIBILITIES

##### 04.01 Radiation Protection Branch, NRR (PRPB)

- a. Establishes and maintains the HPPOS database.
- b. Provides for additions, deletions, and modifications of information in the HPPOS database.
- c. Maintains a system of quality control covering the establishment and maintenance of the Health Physics Positions database.

##### 04.02 Operations Branch, NMSS (IMOB)

- a. Establishes material licensee health physics positions
- b. Develops and submits new positions to the Radiation Protection Branch, NRR for input into the HPPOS database.
- c. Maintains NMSS HPPOS current by submitting to PRPB revisions for the database.

#### 99100-05 MAINTENANCE OF THE DATABASE

05.01 General. New HPPOS are typically developed when a Region requests guidance on a technical issue and headquarters feels the issue has generic applicability to many licensees. The cognizant headquarters office such as the Office of Nuclear Reactor Regulation (NRR) or the Office of Nuclear Material Safety & Safeguards (NMSS), drafts a response for resolving an issue and sends a copy of the draft to all regional offices and to other headquarter offices, as appropriate, for review and comment before the final position document is prepared. When the issue concerns a requirement that applies to all licensees (e.g., the implementation of a provision of 10 CFR Part 20), the draft is reviewed by NMSS (when the draft is prepared by NRR), NRR (when the draft is prepared by NMSS) and the Office of Nuclear Regulatory Research (RES), and all regional offices.

When a draft position could apply to enforcement actions, it is sent to the Office of Enforcement (OE) for review. When the draft position may be considered to be an interpretation of the regulations, it is sent to the Office of the General Counsel (OGC)

for review. If it may change a previous position, the draft is sent to the Chairman of the Committee to Review Generic Requirements (CRGR) to determine whether formal CRGR review is needed.

05.02      Standards for Inclusion. Documents to be included in the HPPOS should meet the following standards:

- a. The document contains guidance not otherwise readily available which inspectors can use in the NRC inspection program for reactors, fuel facilities, and material licensees, or the document contains a position on a regulatory requirement that applies to matters encountered by NRC inspectors who specialize in radiation protection.
- b. The document is a final version that has been signed, dated and issued.
- c. The document has been signed by or concurred in by an appropriate level of NRC management or by a representative of the OGC.
- d. Any issue in the document that is subject to the NRC backfit rule (10 CFR 50.109), has been properly addressed through the applicable NRC backfit procedures.

The database contains a few exception to these standards. For example, the database contains an interpretation of the American National Standards Committee (ANS-3) by the committee that prepared the standard.

#### 99100-06    INSTALLATION AND OPERATION OF THE HPPOS DATABASE

06.01      Installation. The computer program is compiled in dBASE, and can be operated alone, without the dBASE software. To access information from the HPPOS database software more efficiently the software should be loaded onto the user's computer fixed disk drive as follows:

- a. At the DOS prompt, type **MD C:\HP**
- b. Insert the diskette into either drive A or B
- c. Change to the A or B drives by typing **A:** or **B:**
- d. At the prompt type, **PKUNZIP A:\*.ZIP C:HP**
- e. When the program is decompressed, switch back to the C disk drive by typing **C:**
- f. Change to the HP directory by typing **CD\HP**
- g. Run the program by typing **HP**

06.02      Operating Instructions. The program allows the user to search for information by subject code, regulatory reference, and

author. Each screen describes the commands needed to select, search, or print an HPPOS.

- a. Subject Code. The user may search by the code of a specific subject, such as training, high radiation area or enforcement. To select the desired code, the user would scroll through the list until the desired code is highlighted and then press **Enter**. Users not familiar with the subject codes, can page down to the end of the list and select the option "Print the above list of Subject Codes" to obtain a printed copy.
- b. Regulatory Reference. The user may search by regulatory reference, such as 10 CFR 20.203, Regulatory Guide 8.15, NUREG-0737, or ANSI/ANS 3.1. To select the desired reference, the user would scroll through the list until the desired reference is highlighted and then press **Enter**. To obtain a printed copy of the regulatory references the user would page down to the end of the list and select the option "Print the above list of Regulations."
- c. Author. The user may search the database by the last name of the author of the position.

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